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Counsel to Export Development Canada

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

-----X
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., et al., : Case No. 08-35653
:
Debtors. :
: Jointly Administered
-----X

**MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL
BANKRUPTCY RULE 2090-1(E)(2)**

Richard Hutson (the “Movant”), a member in good standing of the bars of, and admitted to practice in, the Commonwealth of Virginia, and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”), and an associate of Fullerton & Knowles, hereby moves (the “Motion”) this Court to enter an order, the proposed form of which is attached hereto as Exhibit “A,” authorizing Ronald A. Clifford of Blakeley & Blakeley LLP, to appear pro hac vice before this Court to represent Export Development Canada in the above-captioned chapter 11 bankruptcy

cases pursuant to Rule 2090-1(E)(2) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the "Local Bankruptcy Rules"). In support of the Motion, the Movant states as follows:

1. Ronald A. Clifford is an associate of Blakeley & Blakeley LLP. Mr. Clifford has appeared regularly before numerous bankruptcy courts throughout the United States in chapter 11 cases. He is admitted, practicing, and in good standing as a member of the bar of the State of California. Among other courts, he is admitted to practice in the Central District of California. Mr. Clifford has been practicing law since 2006. There are no disciplinary proceedings pending against Mr. Clifford
2. The Movant requests that this Court grant this Motion so that the Admittee may appear and be heard at hearings in these chapter 11 cases.

WAIVER OF MEMORANDUM OF LAW

3. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Debtors request that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

NO PRIOR REQUEST

4. No prior request for the relief sought herein has been made to this Court in these bankruptcy cases or to any other court.

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WHEREFORE, the Movant respectfully requests that this Court enter an order, substantially in the form attached hereto as Exhibit “A,” (i) authorizing the Admtee to appear pro hac vice in association with the Movant as attorneys for the Debtors in their chapter 11 cases and (ii) granting such other and further relief as is just and proper.

Dated: April 8, 2009

Respectfully submitted,

By: /s/ Richard Hutson
Richard Hutson (VSB No. 71097)
Fullerton & Knowles P.C.

EXHIBIT "A"

Scott E. Blakeley, Esq. (Cal Bar No. 141418)
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**ORDER GRANTING MOTION TO APPEAR PRO HAC VICE PURSUANT TO
LOCAL BANKRUPTCY RULE 2090-1(E)(2)**

THIS MATTER having come before the Court upon the Motion to Appear Pro
Hac Vice Pursuant to Local Bankruptcy Rule 2090-1(A)(2) (the "Motion") of Richard
Hutson, associate with the law firm of Fullerton & Knowles, P.C., for the admission pro
hac vice of Ronald A. Clifford, the Court finds that (i) it has jurisdiction over the matters
raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding
pursuant to 28 U.S.C. § 157(b)(2), (iii) the relief requested in the Motion is in the best

interest of the Debtors, their estates, and their creditors, (iv) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary, and (v) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion, Therefore,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED.
2. Ronald A. Clifford is permitted to appear pro hac vice as counsel to each of the Debtors in the above-captioned chapter 11 cases in accordance with Local Bankruptcy Rule 2090-1(E)(2).

Dated: April____, 2009

UNITED STATES BANKRUPTCY JUDGE

Certificate of Service

I hereby certify that on April 8, 2009, a copy of the foregoing was filed electronic mail on the following: (i) the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' pre-petition lenders, and counsel to the agents for the Debtors' post-petition lenders; (ii) the 2002 List; and (iii) those additional parties as required by the Case Management Order (all of which are defined in the Case Management Order).

/s/ Ronald A. Clifford